

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

DRAFT PERMIT NO. F-05-032

Vanderbilt Yachts LLC

Rte 3, HWY. 90 CLINTON COUNTY INDUSTRIAL PARK, ALBANY, KY.

FROUGH SHERWANI, REVIEWER

PLANT I.D. # 021-053-00019

AI#: 37775

ACTIVITY # APE20050001

**SOURCE DESCRIPTION:**

The source manufactures fiberglass houseboats. The source is divided into four major areas: a large mold area, a small mold area, a woodworking area and an assembly area. These molds are made of fiberglass. The molding process is divided into three sections: mold maintenance and preparation, gelcoat and resin application and cleanup final finish. Mold maintenance is done using Polycor Retention Green Tooling and Mold Release. The open molding process is done using Polyester Resin spray up application. The clean final finish is done using toluene and acetone.

An airless Air-Assisted Super Pro Gun is used for the gelcoat operation. The transfer capacity of the gun is 80% and maximum gelcoat output is 25 gallons per hour. Gel coat is mixed with 2% High Point 80 Red and High Point 80 Clear (80% Red and 20% Clear).

5% of the time is spent on gelcoat application, 4% of the time is on vinyl ester application, 25% of time is spent on general laminating resin application, and 3% of the time is spent on small parts fabrication using general laminating purpose. The potential to emit calculations are based on 8760 hours of operation per year.

**COMMENTS:**

**Type of control and efficiency:**

Emission points 01 has a central ventilation system with seven exhaust fans, which use generic mat fiberglass filters. The filter has 80% particulate matter control efficiency. Emissions points 02, 04, 05, and 06 are insignificant activities.

**Emission factors and their source:**

AP-42 5<sup>th</sup> edition and "Composite Factors Associates (CFA) unified Emissions Factors for open molding for composite" are used for the emission factors for PM, VOC and HAPS.

**APPLICABLE REGULATION:**

- a. **401 KAR 59:010**, New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975);
- b. **401 KAR 63:020**; Potentially hazardous matter or toxic substances, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.
- c. **401 KAR 52:030**. Federally-enforceable permits for nonmajor sources.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

- a. The source has accepted a facility-wide cap on annual VOC emissions of no more than 90 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- b. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- c. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.